

To: Secretary

RE: Public comments on Broadcast localism MB Docket number 04-233

Dear secretary,

I have read much of the proposed rule-making contained in MB Docket number 04-233 and I find that these proposed changes would not benefit the broadcasters or the listening public.

I have addressed some of the specific proposals below.

remote radio station operation:

Full time staffing of a broadcast facility does not appear necessary with the HIGHLY reliable automated systems that are currently used by many radio station. Larger stations can probably absorb the increased cost of operation that this would impose, but many smaller station might close or curtail their operation. This would not serve the listening public this would be a disservice.

The manned at all times rule would also make it less attractive for a low budget community group to actually acquire and operate a radio station!

The FCC should not require a physical presence at a broadcasting facility during all hours.

main studio rule:

The FCC should not revert to pre 1987 rules requiring the studio be in close proximity to the broadcast station.

Accessibility to the main studio is NOT hampered by it physical location

And the imposition of the earlier rule will not increase interaction between the broadcast station and the community of service.

community advisory board:

is not necessary as long as the station owner makes accessible a mechanism for the listeners to communicate their thoughts or concerns to the station. Any one or more of the following should suffice.

Conventional mail (snail mail), email or telephone.

These methods available to all should be considered to satisfy the requirement of access by the community.

Enhanced disclosure:

The so called public concern about limited disclosure of local programming by broadcasters is absurd! Standardized quarterly reporting would just be cumbersome paperwork to disclose what the broadcast listening community already observes.

Standardized disclosure and outreach mandates are an insult to the station operators and to the communities themselves. Both parties (the broadcasters and the communities) can communicate effectively without mandates.

The proposed modifications will likely hamper the broadcast ownership opportunities for minority-and women-owned businesses and or any small businesses.

Please leave the rules unchanged and not implement these proposed rule changes.

Sincerely,            Alan Atkinson